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**NORTHERN DISTRICT OF CALIFORNIA**

NGOC LAM CHE, an individual

Plaintiff,

vs.

KENZO PROPERTIES, LLC, a limited  
liability company;

Defendants.

Case No.: 5:23-cv-04304-VKD

**PLAINTIFF'S NOTICE OF VOLUNTARY  
DISMISSAL OF ENTIRE ACTION WITH  
PREJUDICE PURSUANT TO FEDERAL  
RULE OF CIVIL PROCEDURE 41(a)(1)**

[Hon. Virginia K. DeMarchi presiding]

1 **PLEASE TAKE NOTICE** that Plaintiff Ngoc Lam Che (“Plaintiff”) pursuant to Federal Rule of  
2 Civil Procedure Rule 41(a)(1), hereby voluntarily dismisses the entire action *with prejudice* pursuant  
3 to Federal Rule of Civil Procedure Rule 41(a)(1) which provides in relevant part:  
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5 **(a) Voluntary Dismissal.**

6 (1) By the Plaintiff.

7 (A) *Without a Court Order*. Subject to Rules 23(e), 23.1(c), 23.2, and 66 and any  
8 applicable federal statute, the plaintiff may dismiss an action without a court order  
9 by filing:

10 (i) A notice of dismissal before the opposing party serves either an  
11 answer or a motion for summary judgment.

12 Defendant KENZO PROPERTIES, LLC, a limited liability company (“Defendant”), has neither  
13 answered Plaintiff’s Complaint, nor filed a motion for summary judgment. Accordingly, Defendant  
14 may be dismissed with prejudice and without an Order of the Court.

15 ASCENSION LAW GROUP, PC

16 DATE: November 1, 2023

17 /s/ Pamela Tsao

18 Pamela Tsao, attorney for Plaintiff

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